

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

AMY SILVIS, on behalf of herself  
and all others similarly situated,

Plaintiff,

vs.

AMBIT NORTHEAST, LLC

Defendant.

No. 2:14-CV-05005-ER

**CLASS ACTION**

**PLAINTIFF’S UNOPPOSED MOTION FOR PRELIMINARY APPROVAL OF  
CLASS ACTION SETTLEMENT**

Pursuant to Rule 23 of the Federal Rules of Civil Procedure, Plaintiff Amy Silvis now moves the Court to enter an order preliminarily approving the Class Action Settlement reached by the parties to resolve the claims of Plaintiff and the proposed Settlement Class.

In support of this motion, Plaintiff relies upon the accompanying Memorandum of Law in Support of Unopposed Motion for Preliminary Approval of Class Action Settlement and the Declaration of Jonathan Shub in Support of Plaintiff’s Unopposed Motion for Preliminary Approval of Class Action Settlement which presents the Class Action Settlement with all supporting documentation.

Plaintiff respectfully requests that the Court enter an order:

1. finding that the proposed settlement is sufficiently fair, reasonable and adequate to allow dissemination of notice of the settlement to the proposed Settlement Class;
2. appointing Class Counsel for the Settlement Class;
3. establishing dates for a hearing on final approval of the proposed settlement and Class Counsel’s request for expenses;
4. approving the form of class notice;

5. approving the notice plan and directing that notice be made available and published;
6. establishing a deadline for filing papers in support of final approval of the proposed settlement and a request for expenses;
7. establishing a deadline for the filing of objections by Settlement Class members; and
8. establishing a deadline for Settlement Class members to exclude themselves from the proposed Settlement Class with respect to the settlement.

Respectfully submitted this 6th day of October, 2017.

Date: October 6, 2017

Respectfully Submitted By:

**KOHN SWIFT & GRAF, P.C.**

/s/ Jonathan Shub

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*Attorneys for Plaintiff and The Class*

**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that the forgoing PLAINTIFF'S UNOPPOSED MOTION FOR PRELIMINARY APPROVAL OF CLASS ACTION SETTLEMENT was served via the Court's ECF system upon all counsel of record on October 6, 2017.

/s/ Jonathan Shub

JONATHAN SHUB